

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)
)
v.) Case No. 3:11-00132
) Chief Judge Haynes
HAWO OSMAN AHMED)

**MOTION AND REQUEST FOR DISCLOSURE OF EVIDENCE OF CRIMES, WRONGS
OR OTHER ACTS**

COMES NOW Defendant Hawo Ahmed, by and through undersigned counsel, and pursuant to Rule 404(b)(2), explicitly requests that the government disclose any evidence of crimes wrongs or other acts (as contemplated by Rule 404(b) of the Federal Rules of Criminal Procedure) it intends to offer against Defendant Ahmed at trial. Defendant Ahmed further moves this Honorable Court for the entry of an Order requiring that said disclosure be made at least fourteen days prior to trial in order to ensure that Defendant Ahmed has an adequate opportunity to investigate the admissibility of the evidence disclosed. The instant Motion and request is made to safeguard Defendant Ahmed's statutory and constitutional rights to due process and a fair trial.

WHEREFORE, Defendant Ahmed respectfully requests that the instant Motion be granted.

Respectfully submitted,

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